

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION V**

DATE: June 12, 2003

FROM: Michael Chrystof

TO: Karen Mason-Smith, Ft. Dearborn RPM

SUBJECT: US-EPA Comments on Draft Construction Completion Report for Various Site Remediations (dated April 2003), Ft. Dearborn, Chicago, Ill.

EPA Region 5 Records Ctr.



374748

Please find attached US-EPA Response to Comments.

Attachment

**US-EPA COMMENTS ON DRAFT CONSTRUCTION COMPLETION REPORT
FOR VARIOUS SITE REMEDIATIONS
FT. DEARBORN, IL**

COMMENTS:

1. **Section 3.1.5 Analytical Data Validation, p.15:** Text states that the independent third-party validation (to be done by USACE contractor Lee A. Knupple and Assoc.), on at least 10% of the data, was submitted separately from this document. US-EPA has not received this data validation report as yet. Please be advised that our review of this Construction Completion Report will not be complete without our ability to review the third-party data validation report, and findings.
2. **Tables Section/all SVOCs:** It was noted that for all the SVOC data tables, significant hits were listed for 2,4,6 Tribromophenol (listed as a surrogate in the SVOC analytical reports provided in Appendix D), but no listing or values for 2,4,6 Trichlorophenol (which was an actual analyte listed in the Appendix D SVOC reports). Is this a typo, or is the surrogate being reported out here?
3. **Appendix D, Case Narratives, Manual Integration:** It was noted for every case narrative, under PCB Fraction - Method 8082, there were listing of pages where manual integration took place, and the only explanation provided was a statement to "See hard copy for explanations of manual integrations". There were no hard copy provided, nor any explanations of why any of this manual integration took place in this report. Please provide an explanation of what manual integrations took place, why they were necessary, and if it was deemed justified.
4. **Appendix D, Lab Report 301101:** The sample VWR-008-02-EBT appears on the chain of custody forms, and has analytical data output forms for VOCs, SVOCs, PCBs, PAHs, Glycol, and Inorganics. However, there is no listing of this data in the Tables section of this report, nor a mention in either the text of the report, or indication on the sampling Figure 4 (Former Vehicle Wash Rack) area, as to where this sample was taken or what impact (if any) this data had. Please explain.
5. **Appendix D, Lab Report 301104:** The sample OWS-005-08-EBT appears to have been run three times for VOCs (there are three separate VOC data sheets, numbered ARDL lab no.301104-01, 301104-01MS, and 301104-MD). The Tables section of the report, shows only the data for one of the samples, not the MS/MD pair. Are the hits for 1,1 dichloroethene, benzene, trichloroethene, toluene, and chlorobenzene shown in the MS and MD samples due only to the matrix spike?
6. **Appendix E, Data Validation Report:** In Section 2.13 Manual Integration, text states that the laboratory case narratives did not provide any documentation of manual

integration for GC or GC/MS analysis. The raw data for only two SDGs were reviewed for evidence of manual integration. There is little or no indication from this Validation Report of why the manual integrations were done, if the manual integrations were done properly, or if they were even necessary. Furthermore, this level of review does not satisfy the requirements of the Region V Manual Integration Policy, as the text infers in the Summary Section 3.0 of this Data Validation Report. The validation did not even satisfy the requirements of the Final Project QAPP (see Final Project QAPP, , June 2002, Section 6.2.5 Manual Integration, p.32 -34). All manually integrated data (100%) must be validated by an independent third party validator. US-EPA has not yet seen the third party validation report, nor any indication that 100% of the manually integrated data has, or ever will be, validated.